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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Joint Petition for Rulemaking to Establish
Rules for Subscriber Access to Cable Home
Wiring for the Delivery of Competing and
Complimentary Video Services

RM 8380

COMMENTS

The Telecommunications Industry Association User Premises Equipment Division ("TIA") hereby responds to the FCC's public notice issued November 15, 1993, DA 93-1343, requesting Comments on the Joint Petition for Rulemaking ("Petition") filed by the Media Access Project, United States Telephone Association, and Citizens for a Sound Economy Foundation ("Petitioners"). The Petitioners requested the Commission to initiate a proceeding to determine how cable subscribers may have access to existing home wiring for the delivery of competing and complementary services. To accomplish this, the Petitioners believe that the Commission's telephone inside wiring rules provide a reasonable model for cable television wiring.

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DISCUSSION

TIA Supports a Proceeding to Determine How Cable Subscribers Can Gain Access to Cable Home Wiring

TIA believes the FCC's procompetitive Customer Premises Equipment ("CPE") and Inside Wiring Rules have benefited the American Public. By deregulating CPE and Inside Wiring, consumers are offered greater choices of supply and the competitive marketplace drives prices to true economic costs. A thriving telephone equipment market also helps the United States in its current balance of payments problem. Telephone equipment exports from this competitive market have risen steadily over the last five years.

A convergence between the telephone industry and the cable industry is occurring, partially driven by new technologies. Telephone companies are delivering services that were once the domain of cable companies, and cable companies are beginning to deliver telephone services. Ownership of the underlying participants is also converging as each week brings announcements of new investments and strategic alliances. On each side of these converging industries there are requests for level playing fields.

TIA agrees with the Petitioners that there is presently an uneven regulatory playing field when telephone inside wiring is subject to one set of rules and policies and cable home wiring is subject to a completely different set of rules and policies. TIA can see no rational policy reason why a telephone subscriber should be able to select source of supply for telephone wiring (or even choose to install the wiring him or herself), and a cable subscriber is forced

to obtain a bottleneck facility from the cable company. A subscriber -- whether the subscriber is a customer of a telephone company or of a cable company -- should have similar legal rights. These rights should not ripen only when a cable subscriber terminates service. Cable subscribers should have the same rights of access and installation and reconfiguration as telephone subscribers.

Many of the wiring techniques between cable and telephone wiring are similar. TIA's Engineering Committee TR-41 has established standards for residential telephone wiring.¹ Work is now underway in Subcommittee TR-41.8 to also have standards for cable wiring. The same policy goals that drove the FCC to deregulate telephone inside wiring are equally applicable to cable wiring: "increase competition, to promote new entry into the market, [and] to produce cost savings which would benefit [consumers]."²

Thus, TIA supports Petitioners in their request for a Rulemaking and agrees: "The Commission can and should act now to create fair competition for all providers and consumers of telecommunications services."³

¹ See ANSI/EIA/TIA-570-91, Residential and Light Commercial Telecommunications Wiring Standard.

² See In the Matter of Detariffing the Installation and Maintenance of Inside Wiring, CC Docket No. 79-105, Second Report and Order, p. 2. (Feb. 24, 1986).

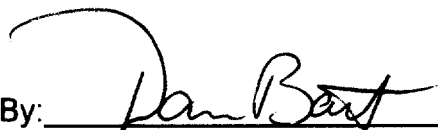
³ Petition, p. 10.

CONCLUSION

The FCC should initiate a proceeding to examine the manner by which all consumers can have access to cable home wiring for the delivery of competing and complementary telecommunications services.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY
ASSOCIATION, USER PREMISES
EQUIPMENT DIVISION**

By: 
Dan Bart, Director,
Technical and Regulatory Affairs

Ron Angner
Chairman, User Premises
Equipment Division

2001 Pennsylvania Ave., N.W.
Suite 800
Washington, DC 20006
202-457-8737

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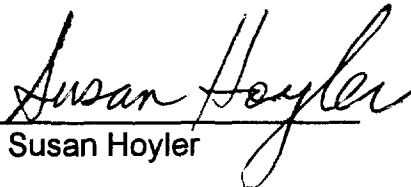
CERTIFICATE OF SERVICE

I, Susan Hoyler, hereby certify that I have served copies of the foregoing "Comments of the Telecommunications Industry Association User Premises Equipment Division" by United States mail, first class postage prepaid, on December 21, 1993 to the following parties:

Gigi B. Sohn
Andrew Jay Schwartzman
2000 M. Street, N.W.
Washington, DC 20036
Counsel for Media Access Project

Martin T. McCue
Vice-President and General Counsel
United States Telephone Association
900 19th Street, N.W., Suite 800
Washington, D.C. 20006

Philip Mink
1250 H. Street, 7th Floor
Washington, D.C. 20005
Counsel for Citizens for a Sound Economy Foundation



Susan Hoyler